

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

NESTLÉ PURINA PETCARE COMPANY,
Plaintiff/ Counterclaim Defendant,

v.

BLUE BUFFALO COMPANY LTD.
Defendant/ Counterclaim Plaintiff.

Case No. 4:14-CV-00859 (RWS)

DECLARATION OF ADEEL A. MANGI

I, ADEEL A. MANGI, declare as follows:

1. I am a member of the firm of Patterson Belknap Webb & Tyler LLP, counsel to Plaintiff Blue Buffalo Company Ltd. (“Blue Buffalo”) in this action. I am familiar with the facts and circumstances of this litigation. I have been admitted *pro hac vice* in this action. I submit this declaration in support of Blue Buffalo’s Opposition to Nestlé Purina PetCare Company’s Motion to Compel Production of Documents.

2. Copies of the following documents are attached as exhibits to this declaration:

- Exhibit 1:** Nestlé Purina, Pet Food Honesty, <http://petfoodhonesty.com/> (with linked-to pages from the October 15, 2014 post)
- Exhibit 2:** NAD Case #4892 (brought by Hill’s Pet Nutrition against Blue Buffalo Company, LLC) (July 31, 2008)
- Exhibit 3:** Nestlé Purina’s First Amended Complaint
- Exhibit 4:** Plaintiff Nestlé Purina PetCare Company’s Responses to Blue Buffalo Company Ltd.’s First Set of Requests for the Production of Documents and Things.

- Exhibit 5:** NAD Case #5696 (brought by Hill's Pet Nutrition, Inc. against Blue Buffalo Company, Ltd.) (Mar. 11, 2014)
- Exhibit 6:** Nestlé Purina, Compare Natural Dog & Cat Food – Beyond®, <https://www.beyondpetfood.com/compare/dry-dog-food>
- Exhibit 7:** NAD Case #4422 (brought by Masterfoods, USA against Nestlé Purina PetCare Company) (Dec. 12, 2005)
- Exhibit 8:** NAD Case #4687 (brought by The Procter & Gamble Company against Nestlé Purina PetCare) (July 5, 2007)
- Exhibit 9:** UPI.com, *Nestle 'Wins' German False Advertising Award*, http://www.upi.com/Odd_News/2014/10/01/Nestle-wins-German-false-advertising-award/9621412168368/ (Oct. 1, 2014)
- Exhibit 10:** Letter from R. Assmus to A. Mangi, dated October 2, 2014
- Exhibit 11:** Council of Better Business Bureaus, National Advertising Division, <http://www.bbb.org/council/the-national-partner-program/national-advertising-review-services/national-advertising-division/>
- Exhibit 12:** Blue Buffalo – Ingredient Glossary, <http://bluebuffalo.com/ingredients/>
- Exhibit 13:** Responses and Objections of Defendant and Counterclaim Plaintiff Blue Buffalo Company Ltd. To Nestlé Purina PetCare Company's First Set of Requests for the Production of Documents and Things
- Exhibit 14:** FDA, Trade Secrets, <http://www.fda.gov/downloads/AboutFDA/Transparency/PublicDisclosure/GlossaryofAcronymsandAbbreviations/UCM212053.pdf>
- Exhibit 15:** Letter from A. Mangi to R. Assmus dated September 12, 2014
- Exhibit 16:** Letter from R. Assmus to A. Mangi dated October 9, 2014

Executed on October 17, 2014

/s/ Adeel A. Mangi

Adeel A. Mangi